



Supplier Food Safety Requirements and Expectations Manual

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Introduction

EG America depends on its supply chain partners to provide our stores with consistent, safe, and high-quality food and beverage products.

As a key part to our success, food safety and quality is embedded in our company culture. As such, EG America has created a ***Supplier Food Safety Requirements and Expectations Manual*** to identify the company's minimum requirements and expectations with respect to our current and potential supplier's food safety and quality management systems. EG America reserves the right to periodically update these requirements.

This document is not intended to replace or supersede any terms and conditions of any contract or confidentiality agreement ("Agreement") previously entered between EG America and its respective suppliers. Accordingly, to the extent of any of the expectations identified in this document contradict or conflict with the terms and conditions of prior Agreement(s), the terms and conditions of those Agreements shall supersede and control. Compliance with these requirements and expectations does not guarantee approved supplier status or any business relationship with EG America.

Thank you for your partnership,
EG America Health and Safety

1. Supplier General Requirements

1.1. Food Production/Supply Agreement and Food Manufacturer's/Supplier's Certification and Continuing Guarantee

As part of the EG America supplier qualification process; all suppliers shall sign and submit the EG America Food Production/Supply Agreement and Food Manufacturer's/Supplier's Certification and Continuing Guarantee. In doing so, the supplier agrees to all terms in the documents as written.

1.2. Notification of Significant Events and Supply Chain Disruptions

The supplier shall promptly notify their category management representative if any, but not limited to, the following occurrences that may cause supply chain disruptions by affecting the products and/or materials supplied to EG America.:

- Recall or Withdrawal because of, but not limited to, process control deviations and/or unsatisfactory microbiological, quality and/or sensory results.
- Any changes to ingredients, significant manufacturing processes, packaging, raw materials, formulations and recipes, specifications, labels.
- Any changes to manufacturing locations, including subcontracting.
- Non-conforming results from a 3rd party, federal, or local government audit.
- Identified labeling defects, such as but not limited to, undeclared allergens or ingredients.
- Suspicion of product tampering
- Identified packaging, ingredient, or processing defects.
- Any other reason that will result in an inability to deliver products and/or materials that meet the specifications agreed upon between EG America and the supplier.

1.3. Third Party Audits

All food and beverage suppliers must undergo an annual third-party food safety/GMP audit conducted by an accredited auditing body for all manufacturing, warehouse and packaging operations.

All new food and beverage suppliers are required to submit a full audit report with corrective that has been conducted within the last twelve (12) months. All existing

suppliers must provide EG America with a full audit report and corrective actions within sixty (60) days of their current audit expiration date.

EG America reserves the right to mandate, within reason, that a food or beverage supplier undergoes an additional third party or second party audit at any time during the twelve (12) month cycle.

All food and beverage suppliers are responsible for all the costs associated with having a third-party audit.

1.4. Food Safety Assessment (FSA)

To promote transparency, communication and an overall strong supplier relationship, EG America reserves the right to conduct an onsite Food Safety Assessment. The supplier must willingly permit qualified representatives of EG America to enter their facility to conduct an FSA. All FSA's will be announced and conducted on a mutually agreed upon date and time between the supplier and EG America.

1.5. Manufacturing/Shipping Locations

The supplier must identify all the manufacturing, packaging and warehousing locations at which their products are manufactured, packed and stored. The supplier agrees to give EG America **prior notice**, in writing, if they will need to manufacture or warehouse a current EG America product at a new location. Supplier is responsible for providing EG America with all food safety and compliance documentation listed in **Appendix A**.

1.6. Product Specifications

The supplier will supply a complete specification for all products and materials sold to EG America.

1.7. Management Responsibility and Commitment

The supplier shall have an organizational structure that clearly defines the roles, relationships, and responsibilities for all employees whose activities directly or indirectly affect food safety.

1.8. Change Management

Suppliers shall establish and maintain a documented change management system to suitably manage all changes to raw materials, ingredients, significant manufacturing processes, packaging, recipes and formulations and/or labels.

Suppliers of EG America's private label products agree to notify EG America in writing **prior** to initiating any changes to ingredient declarations, allergen declarations, nutritional facts panel, and/or special product claims (i.e., kosher, organic, all natural).

2. Food Safety and Quality System

2.1. Overview

Suppliers shall have an established and well-maintained food safety and quality system that includes all the elements outlined in the subsequent sections. The supplier shall be able to demonstrate the effectiveness of the entire system.

2.2. Document Control and Record Retention

EG America requires all its suppliers to implement an effective document control system in which all records pertaining to the quality, food safety, and regulatory compliance of their supplied goods are readily accessible and safeguarded from accidental loss or damage. The supplier's document control system shall include a document master list and address how records are stored, written, revised, approved, and verified. Additionally, the supplier's document control system must address the handling of new and obsolete forms, policies, procedures, and records. The supplier shall retain records for a minimum of 2 calendar years or as appropriate.

2.3. Traceability

All suppliers must have a documented traceability program. The program shall include policies and procedures to ensure that all ingredients, packaging (primary and secondary) and finished products can be traced throughout the entirety of the supply chain. Suppliers must be able to trace one step forward (first external customer) and one-step backward (supplier). The traceability program must include procedures for lot coding, and the tracking of re-work and/or sub-lots.

2.4. Food Safety Plan

All food, beverages, and primary packaging suppliers must have a Food Safety Plan prepared in accordance with FDA Food Safety Modernization Act (FSMA) 21 CFR 117.126 Food Safety Plan. The Food Safety Plan outlines the means by which the supplier controls and assures the safety of their products and shall be developed and maintained by a multidisciplinary food safety team led by an individual who has been formally trained and certified as a Preventative Controls Quality Individual (PCQI). A reassessment of the Food Safety Plan shall be performed annually or when there is a significant process change, increased risk from an identified hazard, a new hazard or any other circumstance in which food safety may be compromised. Each food safety plan shall include all the subsections described in 21 CFR 117.126.

2.5. Recall and Withdrawal Program

For EG America's private labeled products, the supplier agrees to notify EG America in the event of an impending recall or market withdrawal before releasing any public notifications or filing a submission to the FDA's Reportable Food Registry. The supplier must have a detailed, formal recall plan. The plan shall include a recall team and a definition of each member's role and responsibilities. A list of key contacts shall be included in the plan and kept current. The recall plan shall be tested at least annually. Suppliers shall keep documentation and records of all recalls and withdrawals. Suppliers shall investigate all recalls and withdrawals to determine the root cause. Suppliers shall document and communicate to EG America all corrective actions taken as a result of the investigation.

2.6. Supplier Approval

Suppliers shall develop and keep a documented supplier approval program to assure the food safety of any ingredients, raw materials, and packaging components used to produce EG America private labeled finished products. The supplier approval program shall include processes and procedures for the evaluation, approval, and regular review of the food safety and regulatory compliance for all suppliers' manufacturing, packaging and warehousing locations.

2.7. Sanitation

Suppliers shall establish and maintain a documented sanitation program that ensures the cleanliness of non-food and food handling equipment, dry and wet production areas, temperature and non-temperature-controlled storage areas, transportation equipment and all production facilities, structures and employee welfare areas. The supplier's sanitation program shall include the following:

- Written Sanitation Standard Operating Procedures (SSOPs) that describe the methods for cleaning, sanitizing, dismantling and re-assembling of equipment. SSOPs shall also be written for areas considered as high-risk by the facility's food safety team, such as, drains, floors, and other high-risk processing areas.
- Master Sanitation Schedule to schedule periodic cleaning.
- Routine sanitation methods.
- Training for employees involved in sanitation practices.
- Method for controlling any equipment used to clean food contact surfaces.

2.8. Environmental Monitoring

Suppliers shall have a documented and implemented risk-based environmental monitoring program as a means of verifying all sanitation activities. The program shall include roles, responsibilities, and methods. An environmental sampling and testing schedule shall be prepared, detailing the applicable pathogens or indicator organisms for the supplier's industry, sampling frequency and the number of samples to be taken. The program must include procedures for monitoring results and corrective action implementation when unacceptable results are received.

2.9. Good Manufacturing Practices (GMP)

All plant personnel, visitors, and outside contractors shall establish and implement a documented GMP policy that meets or exceeds all the requirements specified in 21 CFR § 110(A).

2.10. Allergen Program

The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating products shall be documented and implemented. The

allergen management program shall include the hazards associated with allergens and their control incorporated into the food safety plan. The allergen control program shall include:

- Specialized cleaning and sanitation procedures that address the removal of all potential allergens to prevent cross contact.
- Provisions for clear identification and labeling in accordance with regulatory requirements of those products produced on production lines and equipment on which foods containing allergens were manufactured.
- Procedures for identifying, controlling, and tracing the re-working of products containing allergens.
- Requirements for the prevention of cross contact between allergenic and non-allergenic products, ingredients, and processing aids.
- Methods and responsibilities for the verification of the allergen control program.

2.11. Pest Control

All manufacturing, packaging, and storage facilities must have a documented integrated pest management program (IPM). The IPM shall include oversight by a professionally licensed Pest Control Operator (PCO). The facility shall maintain and keep current device maps, pesticide applicator's license, PCO's liability insurance, and service reports. Service reports may include pesticide usage, trend reports, pest activity, noted deficiencies (if necessary), and their corresponding corrective actions.

2.12. Food Defense

Facilities must have a documented food defense plan that incorporates measures to prevent intentional chemical, physical or biological adulteration of product at all stages of the supply chain.

The food defense plan must be reviewed annually or sooner if necessary.

2.13. Facility Sanitary Design and Construction

The Supplier's facility and exterior grounds must be designed, constructed, and maintained in a manner that does not pose a risk to the safety of their products or personnel.

- Walls, floors and ceilings must be constructed and maintained so that they are free from bacterial harborage points, easily cleanable, able to be inspected and appropriate for the process and product hazards.
- Exterior grounds must be well kept, free of discarded/unused equipment, overgrown shrubbery and weeds, trash and any other clutter that may provide harborage or breeding places for pests.
- All food contact surfaces must be made of non-porous, easily cleanable materials that are intended for use in a manufacturing facility.
- Food contact surfaces must be maintained so as not to pose a risk to the safety of the products being produced.

2.14. Equipment

All food contact and nonfood contact equipment and utensils used in product zones shall be made of materials that are smooth, corrosion resistant, free of cracks, not pitted and in otherwise good repair.

2.15. Training

Suppliers must have a robust training program that ensures that all employees are trained on food safety and quality principles. At a minimum, the training program shall include: GMP, food defense/security, allergen handling (if applicable), sanitation and HACCP.

2.16. Customer Complaints

Supplier must have program in place for the management of customer complaints and customer complaint data. The customer complaint program shall define how complaints are received, investigated, corrected (establishment of corrective actions) and resolved. Suppliers are expected to review customer complaint data at a define frequency for trends and continuous improvement opportunities. Records of all incidences and corresponding corrective actions shall be maintained and available for review upon request by a qualified representative of EG America.

2.17 Preventative Maintenance

Suppliers must have a preventative maintenance (PM) system to ensure that all equipment and facilities are maintained in order to ensure the food safety and quality of their products.



Appendix A: food safety and compliance documentation

All manufacturer's supplying private label food and beverage products to EG-America must submit the following documentation:

1. Letter of Guarantee
2. Manufacturing Facility location(s) and facility emergency contact
3. FDA Food Facility Registration
4. Food Safety Plan (for products supplied to EG America only)
5. Product Specification (for products supplied to EG America only)
6. Copy of most recent 3rd party audit report and results (GFSI preferred)

Appendix B: RFP Vendor Food Safety Checklist

Upon evaluation, all manufacturer's supplying private label food and beverage products to EG-America must complete the following questionnaire:

1. Manufacturing Site Information
 - a. Facility address: _____
 - i. Secondary Facility Address (if product is manufactured in multiple facilities): _____
 - b. Facility Food Safety Contact Name, email, title, phone number: _____
2. Has the manufacturing site achieved GFSI level Food Safety Audit?
 - a. If, Yes, which scheme (SQF, BRC etc...): _____
 - b. Score of most recent inspection: _____
 - c. Date of most recent inspection: _____
3. Is the company registered under the Bio-terrorism Act of 2002 administered by the US Food and Drug Administration? Y/N
4. Does your company have a HACCP program? Y/N
5. If there is no HACCP program, has a risk assessment been conducted on the product(s) supplied? Y/N
6. Is there a Food Defense Program in place at the company? Y/N
7. Does the company have a Recall Program in place? Y/N
8. Will your company be able to supply COA's and specification for each product supplied? Y/N
9. Is there a supplier approval program for all raw materials? Y/N
10. Is there a Food Safety Program, (production, sanitation, maintenance) Consisting of self-inspection and procedure audits? Y/N
11. Is there an Allergen program in place to identify all allergens? Y/N
12. Does the company have documented employee plant policies and follow The FDA Good Manufacturing Practices (GMP's), including training documentation? Y/N
13. Is there a customer complaint procedure in place? Y/N

- 14. Is there lot traceability on all raw material, products or packaging materials? Y/N
- 15. Do you have a documented recall/withdrawal program? Y/N
- 16. Is there a written Pest Control policy in place? Y/N
- 17. Are there procedures for inspection and security of transport vehicles? Y/N
- 18. Is there a written foreign material program? Y/N